

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

BRENT NIX, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. du PONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION,
ELLIS H. MCGAUGHY, and MICHAEL E.
JOHNSON,

Defendants.

Civil Action No. 7:17-CV-00189-D

ROGER MORTON, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. du PONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION, ELLIS
H. MCGAUGHY, AND MICHAEL E.
JOHNSON,

Defendants.

Civil Action No. 7:17-cv-00197-D

VICTORIA CAREY, MARIE BURRIS,
MICHAEL KISER, and BRENT NIX,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

E.I. du PONT de NEMOURS AND COMPANY
and THE CHEMOURS COMPANY FC, LLC,

Defendants.

Civil Action No. 7:17-CV-00201-D

**DECLARATION OF ERIC SCHACHTER IN SUPPORT OF
CLASS PLAINTIFFS' MOTION FOR APPROVAL OF THE FORM AND MANNER
OF CLASS NOTICE**

I, Eric Schachter, hereby declare as follows:

1. I am a Senior Vice President at A.B. Data, Ltd.'s Class Action Administration Company headquartered in Milwaukee, Wisconsin ("A.B. Data"). My business address is 600 A.B. Data Drive, Milwaukee, Wisconsin 53217. This declaration ("Declaration") is based upon my personal knowledge and upon information provided by Class Counsel, my associates, and A.B. Data staff members.

2. Subject to Court approval, Class Counsel has retained A.B. Data after a competitive bidding process to provide Class Notice and related administrative services. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of class actions, administering some of the largest and most complex notice and settlement programs of all time, involving all aspects of media, direct, and third-party notice plans, data management, claims administration, and settlement fund distribution. A profile of A.B. Data's background and capabilities is attached as **Exhibit A** to this Declaration.

3. I submit this Declaration at the request of Class Counsel in connection with the Court's Order granting in part plaintiffs' motion for class certification, ECF No. 420 (the "Class Certification Order") in the above-captioned action (the "Action").

4. This Declaration describes the proposed Class Notice plan designed to provide notice, pursuant to the Class Certification Order, in compliance with Rule 23 of the Federal Rules of Civil Procedure.

5. The Classes¹ are generally defined as:

¹ The Court certified two Classes. Any person or entity included in either or both of these Classes is referred to in this declaration as a "Class member."

a. Public Utility Class: Property owners or renters whose property is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant; and

b. Groundwater Class: Property owners or renters whose property receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant.

6. There are also three damages subclasses:

a. Owner-Occupier/Renter Damages Subclass: Current owner-occupiers or renters of residential property who have not yet installed both reverse osmosis filters and new water heaters on their property;

b. Purchaser Damages Subclass: Property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present; and

c. Long-Time Property Owner Damages Subclass: Property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters.

7. Notice-related activities will include direct notice by first-class mail to Class members, publishing a notice in certain newspapers, causing digital banner advertisements to appear across a number of digital networks and platforms, issuing a statewide press release and tweet, establishing and maintaining a dedicated case-specific website and toll-free telephone line, and processing requests for exclusion and other inquiries and correspondence from Class members.

8. To effectuate direct notice, the parties will initially provide A.B. Data with a list of known mailing addresses for Class members. The public water utilities of Bladen, Brunswick,

Cumberland, New Hanover, and Pender Counties in North Carolina will be notified of the pendency of the class action and asked to either provide A.B. Data with the names and addresses of potential Class members, or to forward the Court-approved notice to such potential Class members. Reasonable costs they incur in mailing the notice will be reimbursed.

9. A.B. Data will mail a short-form notice in the form of a postcard (“Postcard Notice”), attached as **Exhibit B**, to each potential Class member with a known mailing address. Prior to mailing the Postcard Notices, A.B. Data will process the names and mailing addresses they receive through the National Change of Address database compiled and maintained by the U.S. Postal Service (“USPS”) to standardize and update the addresses pursuant to any moves registered with the USPS. For any Class member with a registered change of address, A.B. Data will mail a Postcard Notice to the updated mailing address provided by the USPS.

10. For any Postcard Notice returned to A.B. Data by the USPS as undeliverable as addressed (“UAA”) with a forwarding address provided, A.B. Data will promptly remail the Postcard Notice to the forwarding address. For any UAA Postcard Notice returned with no forwarding address provided, A.B. Data will search for an updated address using an information provider to which we subscribe. If an updated address is available, A.B. Data will promptly remail the Postcard Notice to the updated address.

11. To provide notice to Class members who are not on the known list of Class members, or who may have relocated or are otherwise unreachable by direct mail, A.B. Data will also publish the short-form notice (“Publication Notice”) once in the following newspapers covering the affected counties in North Carolina:

<u>Newspaper</u>	<u>Area Covered</u>
<i>Up & Coming Weekly</i>	Cumberland, NC

<i>Bladen Journal</i>	Bladen, NC
<i>Fayetteville Observer</i>	Fayetteville, NC
<i>Wilmington Star News</i>	New Hanover, NC
<i>Brunswick Beacon</i>	Brunswick, NC
<i>The Pender-Topsail Post & Voice</i>	Pender, NC
<i>Raleigh News & Observer</i>	Raleigh, NC

12. The Publication Notice is attached as **Exhibit C**.

13. To supplement the direct notice and publication efforts, targeted digital banner ads will be placed via Google Display Networks and YouTube. Images appropriate for this Action and target audience will also be included in all digital ad formats, as this increases the visibility and click-through rate of the ads. A sample banner ad is attached as **Exhibit D**. All banner ads will include an embedded and trackable link to the case-specific website. Links will be tracked using Google Analytics tracking codes, providing a way to optimize ads based on traffic and conversions.

14. The digital impressions² will be highly targeted, specifically delivered to potential Class members using known contact information and to digital users who have expressed an interest in information relevant to the subject of this case. Impressions will also be geographically targeted to the affected counties in North Carolina.

15. To make it easy for potential Class members to locate the case-specific website, sponsored search listings will be purchased to appear on Google, the most highly visited search engine, and/or other search partners. When a person uses a specific target phrase and/or keyword

² Gross impressions are the duplicated sum of audiences of all media vehicles containing the notice.

in a search engine to search for information, the link to the case-specific website may appear on the search result pages. Sample keyword terms or phrases may include “Chemours class action,” “DuPont Chemours lawsuit,” “Cape Fear PFAS class action lawsuit,” and many others.

16. In addition to the paid media, A.B. Data will distribute the short-form notice through a statewide news release via *PR Newswire*’s North Carolina Newsline to help the case gain more attention from the media and potential Class members. The news release will reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide. The news release is attached as **Exhibit E**.

17. News about the Action will also be broadcast to the news media via Twitter. It will be tweeted from *PR Newswire*’s and A.B. Data’s Twitter accounts to media outlets, journalists, and other followers.

18. A.B. Data will host and maintain the case-specific website. The website will provide summary information about the Action, answers to frequently asked questions, and an ability to download the full notice (“Long-Form Notice, attached as **Exhibit F**), relevant filings, and Court orders. The website will also provide pertinent updates about the litigation and allow Class members to submit their contact information to receive future updates by mail and/or by email.

19. A.B. Data will also establish and maintain a toll-free telephone number with interactive voice response (“IVR”) technology to address callers’ questions and provide information about the Action.

20. Both the toll-free telephone number and case-specific website address will be displayed on all versions of the Class Notice.

21. The Long-Form Notice includes specific instructions on how to request exclusion from the Class. A.B. Data will receive and process all exclusion requests and promptly notify Class Counsel of the same.

22. Based on my similar experience with other class action notice plans, it is my conclusion that the Class Notice plan described herein, utilizing direct mail notice to Class members, supplemented by digital and print media targeted to Class members and earned media, is the best notice practicable under the circumstances.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of January 2024 at Milwaukee, Wisconsin.

A handwritten signature in black ink, appearing to read 'Eric Schachter', written over a horizontal line.

Eric Schachter

EXHIBIT A

**Class
Action
Administration**



Headquarters

600 A.B. Data Drive
Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

New York

One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC

915 15th St., NW, Ste. 300
Washington, DC 20005
P: 202-618-2900
F: 202-462-2085

Florida


5080 PGA Boulevard, Ste. 209
Palm Beach Gardens, FL 33418
P: 561-336-1801
F: 561-252-7720

Israel

19 Weissburg Street
Tel Aviv 69358
Israel
P: +972 (3) 720-8782


CAPABILITIES

About A.B. Data


 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Eric Schachter, Senior Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Elaine Pang, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

Paul Sauberer, Vice President of Quality, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Steve Straub, Senior Director of Operations, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Claimant Operations Director, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

Jack Ewashko, Director of Client Services, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

Brian Devery, Director of Client Services, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

Adam Walter, PMP, Director of Client Services, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Eric Nordskog, Director of Client Services, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*

- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation – Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structurals, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*

- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
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Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard., et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*
- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*

- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al.* (PG&E Securities II)
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al.* (Echostar)
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trevena, Inc., et al.*
- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al.* (Nutraceutical)
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAL Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al.* (Capital Bank)
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al.* (SRW Wheat Futures)
- *Yannes, et al. v. SCWorx Corporation*
- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al.* (Exactech)
- *In re Columbia Pipeline Group, Inc. Merger Litigation*

- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*

- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*
- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*

- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. ("Dovetail Settlement")*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15th Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

Data Breach/BIPA Cases

- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*
- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc. ("Briggs Biometric Settlement")*
- *Trost v. Pretium Packaging L.L.C.*

- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

Telephone Consumer Protection Act (TCPA) Cases

- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com.

EXHIBIT B

LEGAL NOTICE

**If the property you own or rent receives
water from a public water utility or
groundwater source containing chemicals
from Fayetteville Works, you could be part
of a class action lawsuit.**

Records show you could be affected by a class action lawsuit against E.I. du Pont de Nemours and Company and The Chemours Company FC, LLC (“the Defendants”) that alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing per- and polyfluorinated substances (“PFAS”) into the Cape Fear River, contaminating the water. The Court decided that this case should be certified as a class action on behalf of two “Classes” or groups of people that could include you. The Court has not decided who is right. There is no money or other benefit available now and no guarantee there will be.

DuPont Water Class Action Lawsuit
c/o A.B. Data, Ltd.
PO Box 173062
Milwaukee, WI 53217

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What is this case about? The lawsuit alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing PFAS into the Cape Fear River, contaminating the water. As a result, the lawsuit alleges that drinking water was contaminated and water pipes were damaged. It alleges that PFAS can cause certain cancers and other diseases, and that people living close to the plant who drank the polluted water became sick because they were exposed to PFAS. The lawsuit also alleges the Defendants knew PFAS was dangerous and did not tell anyone that they released these chemicals into the Cape Fear River and the environment around the Fayetteville Works plant. The Defendants deny these claims and deny they did anything wrong. The lawyers for the Classes will have to prove their claims in Court.

Are you included? In this class action there are two Classes, and you are included if you are a property owner or renter whose property (1) is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant (“Public Utility Class”); or (2) receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant (“Groundwater Class”). There are also three damages subclasses: (1) current residential property owner-occupiers or renters who have not yet installed both reverse osmosis filters and new water heaters on their property (“Owner-Occupier/Renter Damages Subclass”); (2) property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present (“Purchaser Damages Subclass”); or (3) property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters (“Long-Time Property Owner Damages Subclass”).

Who represents the Classes? The Court has appointed a group of attorneys to represent the Classes as “Class Counsel.” You do not have to pay Class Counsel or anyone else to participate. Instead, if Class Counsel recovers money or benefits for the Class(es), they will ask the Court for their attorneys’ fees and expenses. If approved, these fees and expenses will be deducted from any money obtained for the Class(es) or paid separately by the Defendants. You may hire your own lawyer to appear in Court for you, but if you do, you have to pay that lawyer.

What are your options? To stay in the Class(es), you do not have to do anything. If money or benefits are obtained, you will be notified of how to request a share. If you stay in the Class(es), you will not be able to sue the Defendants on your own about the claims in this lawsuit. If you want to maintain your rights to sue on your own, you must exclude yourself by **[Month 00, 2023]** by following the procedure set forth on the website for the case, www.NCPFASLitigation.com. If you exclude yourself, you cannot get money or benefits from this lawsuit if any are awarded.

For more information: 1-877-495-0948

www.NCPFASLitigation.com

EXHIBIT C

LEGAL NOTICE

If the Property You Own or Rent Receives Water from a Public Water Utility or Groundwater Source Containing Chemicals from Fayetteville Works, You Could Be Part of a Class Action Lawsuit

There is a class action lawsuit against E.I. du Pont de Nemours and Company and The Chemours Company FC, LLC (“the Defendants”) that alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing per- and polyfluorinated substances (“PFAS”) into the Cape Fear River, contaminating the water. The Court decided that this case should be certified as a class action on behalf of two “Classes” or groups of people that could include you. The Court has not decided who is right. There is no money or other benefit available now and no guarantee there will be.

What is this case about?

The lawsuit alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing PFAS into the Cape Fear River, contaminating the water. As a result, the lawsuit alleges that drinking water was contaminated and water pipes were damaged. It alleges that PFAS can cause certain cancers and other diseases, and that people living close to the plant who drank the polluted water became sick because they were exposed to PFAS. The lawsuit also alleges the Defendants knew PFAS was dangerous and did not tell anyone that they released these chemicals into the Cape Fear River and the environment around the Fayetteville Works plant. The Defendants deny these claims and deny they did anything wrong. The lawyers for the Classes will have to prove their claims in Court.

Am I included?

In this class action there are two Classes, and you are included if you are a property owner or renter whose property (1) is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant (“Public Utility Class”); or (2) receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant (“Groundwater Class”). There are also three damages subclasses: (1) current residential property owner-occupiers or renters who have not yet installed both reverse osmosis filters and new water heaters on their property (“Owner-Occupier/Renter Damages Subclass”); (2) property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present (“Purchaser Damages Subclass”); or (3) property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters (“Long-Time Property Owner Damages Subclass”).

Who represents the Classes?

The Court has appointed a group of attorneys to represent the Classes as “Class Counsel.” You do not have to pay Class Counsel or anyone else to participate. Instead, if Class Counsel recovers money or benefits for the Class(es), they will ask the Court for their attorneys’ fees and expenses. If approved, these fees and expenses will be deducted from any money obtained for the Class(es) or paid separately by the Defendants. You may hire your own lawyer to appear in Court for you, but if you do, you have to pay that lawyer.

What are my options?

To stay in the Class(es), you do not have to do anything. If money or benefits are obtained, you will be notified of how to request a share. If you stay in the Class(es), you will not be able to sue the Defendants on your own about the claims in this lawsuit. If you want to maintain your rights to sue on your own, you must exclude yourself by [Month 00, 2023] by following the procedure set forth on the website for the case, www.NCPFASLitigation.com. If you exclude yourself, you cannot get money or benefits from this lawsuit if any are awarded.

EXHIBIT D

**Have you ever owned or rented
property that receives water from a
public water utility or groundwater
source containing chemicals from
Fayetteville Works?**

**YOU COULD BE PART OF
A CLASS ACTION LAWSUIT**

Learn More >

NCPFASLitigation.com

EXHIBIT E

Cohen Milstein Sellers & Toll PLLC and Susman Godfrey LLP Announce a Class Action Lawsuit That May Affect Anyone Who Owns or Rents Property That Receives Water from a Public Water Utility or Groundwater Source Containing Chemicals from Fayetteville Works

Raleigh, NC / Month 00, 2023 / PR Newswire—

There is a class action lawsuit against E.I. du Pont de Nemours and Company and The Chemours Company FC, LLC (“the Defendants”) that alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing per- and polyfluorinated substances (“PFAS”) into the Cape Fear River, contaminating the water. The Court decided that this case should be certified as a class action on behalf of two “Classes” or groups of people that could include you. The Court has not decided who is right. There is no money or other benefit available now and no guarantee there will be.

What is this case about?

The lawsuit alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing PFAS into the Cape Fear River, contaminating the water. As a result, the lawsuit alleges that drinking water was contaminated and water pipes were damaged. It alleges that PFAS can cause certain cancers and other diseases, and that people living close to the plant who drank the polluted water became sick because they were exposed to PFAS. The lawsuit also alleges the Defendants knew PFAS was dangerous and did not tell anyone that they released these chemicals into the Cape Fear River and the environment around the Fayetteville Works plant. The Defendants deny these claims and deny they did anything wrong. The lawyers for the Classes will have to prove their claims in Court.

Who is included?

In this class action there are two Classes, and you are included if you are a property owner or renter whose property (1) is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant (“Public Utility Class”); or (2) receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant (“Groundwater Class”). There are also three damages subclasses: (1) current residential property owner-occupiers or renters who have not yet installed both reverse osmosis filters and new water heaters on their property (“Owner-Occupier/Renter Damages Subclass”); (2) property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present (“Purchaser Damages Subclass”); or (3) property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters (“Long-Time Property Owner Damages Subclass”).

Who represents the Classes?

The Court has appointed a group of attorneys to represent the Classes as “Class Counsel.” You do not have to pay Class Counsel or anyone else to participate. Instead, if Class Counsel recovers money or benefits for the Class(es), they will ask the Court for their attorneys’ fees and expenses. If approved, these fees and expenses will be deducted from any money obtained for the Class(es) or paid separately by the Defendants. You may hire your own lawyer to appear in Court for you, but if you do, you have to pay that lawyer.

What are my options?

To stay in the Class(es), you do not have to do anything. If money or benefits are obtained, you will be notified of how to request a share. If you stay in the Class(es), you will not be able to sue the Defendants on your own about the claims in this lawsuit. If you want to maintain your rights to sue on your own, you must exclude yourself by [Month 00, 2023] by following the procedure set forth on the website for the case, www.NCPFASLitigation.com. If you exclude yourself, you cannot get money or benefits from this lawsuit if any are awarded.

For more information:

Call: 1-877-495-0948

Visit: www.NCPFASLitigation.com

Source: Cohen Milstein Sellers & Toll PLLC and Susman Godfrey LLP

Contact:

Kate Fitzgerald
202-408-4600

EXHIBIT F

**Does the property you own or rent receive water from a public water utility or groundwater source containing chemicals from Fayetteville Works?
If so, you could be part of a class action lawsuit.**

A federal court has authorized this notice. You are not being sued.

- You could be affected by a class action lawsuit against E.I. du Pont de Nemours and Company and The Chemours Company FC, LLC (“the Defendants”). The lawsuit alleges that beginning in 1980, the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing per- and polyfluorinated substances (“PFAS”) into the Cape Fear River, contaminating the water.
- A Court has approved the lawsuit to proceed as a class action for two main groups of people (or “Classes”):
 - Public Utility Class: Property owners or renters whose property is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant; or
 - Groundwater Class: Property owners or renters whose property receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant.

There are also three damages subclasses:

- Owner-Occupier/Renter Damages Subclass: Current owner-occupiers or renters of residential property who have not yet installed both reverse osmosis filters and new water heaters on their property.
 - Purchaser Damages Subclass: Property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present.
 - Long-Time Property Owner Damages Subclass: Property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters.
- The Court has not decided whether the Defendants did anything wrong, and the case will be scheduled for trial. There is no money or other benefit available now and no guarantee there will be. However, your rights are affected, and you have a choice to make now.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	<p>Stay in this lawsuit. Await the outcome. Possibly get benefits. Give up certain rights.</p> <p>By doing nothing, you maintain the possibility of getting money or benefits that may come from a trial or settlement. But you give up any rights to sue the Defendants on your own about the claims in this lawsuit.</p>
EXCLUDE YOURSELF	<p>Get out of this lawsuit. Get no benefits from it. Keep your rights.</p> <p>If you ask to be excluded from the lawsuit, you will not get any money or benefits that may come from a trial or settlement. But you keep any rights to sue the Defendants on your own about the claims in this lawsuit.</p>

- Your options are explained in this notice. To ask to be excluded, you must act by **[Month 00, 2023]**.
- Lawyers must prove the claims against the Defendants at a trial. If money or benefits are obtained in the future from trial or a settlement, you will be notified about how to request a share.

Basic Information

1. Why was this notice issued?

This lawsuit has been “certified” as a class action. This means that the lawsuit meets the requirements for class actions and may proceed to trial. If you are included in the definitions of the Classes above, you are entitled to know about your rights and options before the Court holds a trial to decide whether the claims being made against the Defendants have merit. This notice explains all of these things.

Judge James C. Dever III, of the United States District Court for the Eastern District of North Carolina Southern Division, is currently overseeing this lawsuit. This case is known as *Nix v. The Chemours Co. FC, LLC*, No. 7:17-cv-00189. The people who sued are called the Plaintiffs. DuPont and Chemours are the Defendants.

2. What is this lawsuit about?

The lawsuit alleges that the Fayetteville Works plant, operated by the Defendants, discharged wastewater containing per- and polyfluorinated substances (“PFAS”) into the Cape Fear River beginning in 1980. As a result, the lawsuit alleges that the river water was polluted, drinking water was contaminated, and water pipes were damaged. It also alleges that PFAS can cause certain cancers and other diseases, and people living close to the plant who drank the polluted water became sick because they were exposed to PFAS. The lawsuit also alleges the Defendants knew PFAS was dangerous and did not tell anyone that they released these chemicals into the Cape Fear River and the environment around the Fayetteville Works plant.

The Defendants deny these claims. The Court has not decided whether the Plaintiffs or the Defendants are correct. The lawyers for the Plaintiffs will have to prove Plaintiffs’ claims in Court.

3. What are PFAS?

PFAS or per- and polyfluorinated substances are chemicals that make certain coatings and products that resist heat, oil, stains, grease, and water. They are often used to make non-stick pans, clothing, furniture, adhesives, food packaging, and electrical wire insulation. Plaintiffs allege that these chemicals do not break down naturally in the environment, can move through soil to contaminate drinking water, and have been linked to cancers and other diseases.

4. Why is this a class action?

In a class action, one or more people called “class representatives” (in this case, Victoria Carey, Marie Burris, and Brent Nix) sue on behalf of people who have similar claims. All of these people are a “class” or “class members.” One court and one case resolve the issues for all class members, except for those people who exclude themselves from the class.

5. Who is a member of the class?

In this class action there are two Classes: the Public Utility Class and the Groundwater Class. You are included if you are a property owner or renter whose property:

- Is serviced by a public water utility servicing Bladen, Brunswick, Cumberland, New Hanover, or Pender Counties that draws water from or obtains water drawn from the Cape Fear River downstream of the Fayetteville Works plant (“Public Utility Class”), or
- Receives drinking water from a groundwater source with quantifiable concentrations of any of certain PFAS from the Fayetteville Works plant (“Groundwater Class”).

There are also three damages subclasses:

- Current residential property owner-occupiers or renters who have not yet installed both reverse osmosis filters and new water heaters on their property (“Owner-Occupier/Renter Damages Subclass”);
- Property owners or renters who paid for bottled water, water heaters, and/or reverse osmosis filters from 2017 to present (“Purchaser Damages Subclass”); and

- Property owners who purchased their residential property prior to June 2017 and have not installed both reverse osmosis filters and new water heaters (“Long-Time Property Owner Damages Subclass”).

6. Who is not included?

The Classes do **not** include the Defendants, government entities, judicial officers involved in this case, and anyone who excludes themselves (see Question 11).

7. What should I do if I am still not sure whether I am included?

If you are still not sure whether you are included, you can ask for free help. Visit the website, www.NCPFASLitigation.com, or call 1-877-495-0948 for more information.

8. What are the Plaintiffs asking for?

Plaintiffs are asking for money and other benefits for the Classes, including the costs of filtration systems and bottled water and to replace plumbing and home appliances.

9. Is there any money available now?

No money or benefits are available now because the Court and/or jury has not yet decided whether the Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified of how to request a share.

Your Rights and Options

You have to decide whether to stay in the lawsuit or to exclude yourself by **[Month 00, 2023]**.

10. What happens if I do nothing?

If you do nothing, you will automatically remain in the Class(es). You will be legally bound by all Court orders, good or bad. If you stay in the Class(es), you will not be able to sue the Defendants on your own about the claims in this lawsuit. If any money or benefits are awarded in the future, you may need to take action to get them.

11. What if I don’t want to be in the Class(es)?

If you decide not to participate in the lawsuit, you must exclude yourself—this is sometimes called “opting out.” If you exclude yourself, you will not get any money or benefits that may be obtained as a result of this lawsuit. You will not be bound by any Court orders, and you keep your right to sue the Defendants on your own about the claims in this lawsuit.

To exclude yourself from the Class(es), you must mail a letter to the Notice Administrator. Your request must include:

- your name, address, and telephone number;
- your email address (if available);
- a statement that you want to be excluded from the class action *Nix v. The Chemours Co. FC, LLC*, No. 7:17-cv-00189; and
- your signature.

Mail your exclusion request, postmarked no later than **[Month 00, 2023]**, to:

DuPont Water Class Action Lawsuit Exclusions
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

The Lawyers Representing You

12. Do I have a lawyer in the case?

Yes. The Court has appointed the following law firms to represent you and the other class members as “Class Counsel”:

Theodore J. Leopold Leslie M. Kroeger Cohen Milstein Sellers & Toll PLLC 11780 U.S. Highway One Suite N500 Palm Beach Gardens, FL 33408	Vineet Bhatia Susman Godfrey LLP 1000 Louisiana St. Suite 5100 Houston, TX 77002-5096
S. Douglas Bunch Alison Deich Cohen Milstein Sellers & Toll PLLC 1100 New York Ave. NW Fifth Floor Washington, DC 20005	Stephen Morrissey Jordan Connors Steven Seigel Susman Godfrey LLP 401 Union Street Suite 3000 Seattle, WA 98101

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

13. How will the lawyers be paid?

If Class Counsel recovers money or benefits for the Class(es), they will ask the Court for attorneys’ fees and expenses. If the Court approves Class Counsel’s request, the fees and expenses will be deducted from any money obtained for the Class(es) or paid separately by the Defendants. No matter what happens, you will not have to pay any attorneys’ fees or expenses to the lawyers representing the Classes.

A Trial

14. How and when will the Court decide who is right?

If the case is not dismissed or settled, the Plaintiffs will have to prove their claims at a trial that will take place at the United States Courthouse, 310 New Bern Avenue, Raleigh, NC 27601. During the trial, a jury and/or judge will hear evidence and decide whether the Plaintiffs or the Defendants are correct about the claims in the lawsuit. There is no guarantee that the Plaintiffs will win any money or benefit for the Classes. No trial date has been set at this time.

15. Will I get money after the trial?

If the Plaintiffs obtain money or benefits as a result of a trial or settlement, you will be notified of how to ask to participate (or request a payment or benefits) and what your other options are at that time. These things are not known now. Important information about the case will be posted on the website, www.NCPFASLitigation.com, as it becomes available.

Getting More Information

16. How do I get more information?

You can get more information at www.NCPFASLitigation.com, by calling toll-free 1-877-495-0948, by writing to DuPont Water Class Action Lawsuit, c/o A.B. Data, Ltd., P.O. Box 173062, Milwaukee, WI 53217, or by emailing info@NCPFASLitigation.com.